

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK
WATERTOWN DIVISION**

CAROLYN PARKER)	Case No. 7:10-cv-01282-TJM -ATB
)	
Plaintiff,)	
)	
vs.)	MOTION FOR DEFAULT
)	
SRS & ASSOCIATES, INC.)	
)	
Defendant.)	
_____)	

Plaintiff hereby moves for default judgment against Defendant SRS & Associates, Inc. whom was served via personal service on November 18, 2010. See Exhibit A. Defendant has offered no explanation for their failure to answer the instant complaint. Accordingly, Plaintiff seeks default against Defendant in the amount of Four Thousand Three Hundred Eighty-One dollars and Fifty cents (\$4,381.50), representing statutory damages in the amount of One Thousand dollars (\$1,000.00), 15 U.S.C. §1692(k)(a)(2)(A), Two Thousand Nine Hundred Fifty-Six dollars and Fifty cents (\$2,956.50) in attorney fees and Four Hundred Twenty-Five dollars (\$425.00) for court costs.

This sum is supported by the Affidavit of undersigned, attached hereto as Exhibit B.

This 14th day of January, 2011.

ATTORNEYS FOR PLAINTIFF
Carolyn Parker

Respectfully submitted,

s/Dennis R. Kurz
Dennis R. Kurz
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Filed electronically on this 14th day of January, 2011, with:

United States District Court CM/ECF system

Copy mailed on this 14th day of January, 2011, to:

SRS & Associates, Inc.
1173 East Landis
Building B
Vineland, NJ 08360

s/Tremain Davis
Tremain Davis